



April 26, 2000

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Dockets Management Branch (HFA-305)  
Food and Drug Administration  
5630 Fishers Lane, Room 1061  
Rockville, MD 20852

**NATIONAL  
FOOD**

RE: Docket No. 97N-046/ Food and Drug Administration Draft Study Report;  
Feasibility of Appropriate Methods of Informing Customers of the Contents of  
Bottled Water (65 FR 8718)

**PROCESSORS**

Dear Sir or Madam:

**ASSOCIATION**

The National Food Processors Association (NFPA) provides the following comments regarding the Food and Drug Administration's (FDA) draft study report on the feasibility of appropriate methods of informing customers of the contents of bottled water. NFPA is the voice of the \$460 billion food processing industry on scientific and public policy issues involving food safety, nutrition, technical and regulatory matters and consumer affairs. NFPA's three scientific centers, its scientists and professional staff represent food industry interests on government and regulatory affairs and provide research, technical services, education, communications and crisis management support for the association's U.S. and international members. NFPA's members produce processed and packaged fruit, vegetable, and grain products, meat, poultry, and seafood products, snacks, drinks, and juices, or provide supplies and services to food manufacturers.

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In general, NFPA agrees with the FDA's finding that only limited methods may be remotely feasible or appropriate for informing customers of the contents of bottled water. NFPA believes FDA has fulfilled its obligation under the Safe Drinking Water Act Amendments and that no further action or consideration of the issue is necessary. The draft report suggests FDA may consider additional action beyond the report with the statement, "Based on the comments received, the agency plans to discuss the possibility of further action on this subject, if any is necessary, in the final report". NFPA believes consideration of further action is unnecessary with respect to the requirements of the Safe Drinking Water Act Amendments of 1996 and, in addition, would be inappropriate.

WASHINGTON, DC

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SEATTLE, WA

NFPA believes the standards, definitions, and labeling requirements for bottled water are adequately addressed under 21 CFR 165.110 and related food labeling regulations. NFPA believes that it is inappropriate, in terms of the broader issue of food labeling and consumer information, to further consider steps to expand consumer information requirements that are not clearly and precisely defined by existing authority. NFPA opposes any Agency action that would apply the information requirements required of community water systems information

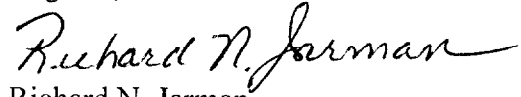
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requirements such as those required of community under Environmental Protection Agency regulations for consumer confidence reports to food products.

NFPA appreciates this opportunity to comment.

Regards,

A handwritten signature in black ink, reading "Richard N. Jarman". The signature is written in a cursive style with a large, stylized "R" and "J".

Richard N. Jarman

Senior Director Food and Environmental Policy  
(202/639-5925)



NATIONAL FOOD PROCESSORS ASSOCIATION

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